

EXHIBIT B

MAZZOLA LINDSTROM LLP

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**RE: Athena Art Finance Corp. v. Certain Artwork by Jean-Michel
Basquiat entitled Humidity, 1982
Docket No.: 20-cv-04669**

Dear Judd:

We write to reiterate our request for certain documents, which requests were made on the record during Mr. Pesko's initial deposition session on May 3, 2022. The relevant documents were sought in Athena's discovery requests, and therefore should have been produced before Mr. Pesko's initial deposition and will be necessary for the completion of his deposition.

Request No. 4 from Athena's July 8, 2021 Second Requests for the Production of Documents asked for the following:

4. All Documents and Communications concerning Aleksandar Pesko's authority to act on Satfinance's behalf, his role within Satfinance and/or his compensation, including but not limited to any agreement(s) between Satfinance and Aleksandar Pesko.

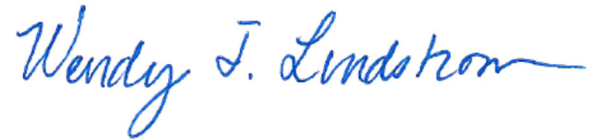
During Mr. Pesko's deposition testimony, he described a "power of authority" document conferring authority on him to act on Satfinance's behalf (40: 9-12), yet such document has not to date been produced. Mr. Pesko also testified as to an "advisory agreement" between Satfinance and him (43: 13-20). We therefore call for the production of any power of attorney documents or advisory agreements from 2016 to the present.

Athena's First Requests also demanded all "communications with Andre Sakhai regarding the Painting, Athena and/or Philbrick" (Request No. 23) and all "Communications with Kenny Schachter regarding the Painting, Athena and/or Philbrick" (Request No. 31). Mr. Pesko testified concerning communications with both Mr. Sakhai (224: 19 – 225:6) and Mr. Schachter (225: 10 – 20) concerning Mr. Philbrick. Please produce any such communications.

Please let us know when you expect to produce the above-referenced documents – all of which were previously requested by Athena – so that we can schedule the completion of Mr. Pesko's deposition. We cannot go forward tomorrow without them.

Yours,

Mazzola Lindstrom LLP

A handwritten signature in blue ink that reads "Wendy J. Lindstrom". The signature is fluid and cursive, with a long horizontal flourish at the end.

Wendy J. Lindstrom

Counsel to Athena Art Finance

cc: All counsel of record (via email)